



## **CALL FOR PUBLIC CONSULTATION – RAIL INDUSTRY SAFETY AND STANDARDS BOARD AS 7531 ROLLING STOCK LIGHTING AND VISIBILITY**

### **AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 27 OCTOBER 2023**

#### **1. About the Australian Trucking Association**

The Australian Trucking Association (ATA) is a united voice for our members on trucking issues of national importance. Together, we represent the 59,000 businesses and 200,000 people who make up the Australian trucking industry.

#### **2. Introduction**

The National Level Crossing Safety Committee has developed a comprehensive national strategy for the continual improvement of level crossing safety. This vision sees 'Zero harm at Australia's level crossings' and is supported by five key objectives:

1. Improve level crossing user behaviour through education and enforcement.
2. Leverage opportunities from emerging technology and innovations.
3. Identify opportunities to deliver early, low cost and effective safety improvements.
4. Support the development of improved data and knowledge on level crossings.
5. Increase coordination and sharing between those responsible for level crossing safety.

#### **3. The ATA supports the improvements included in the draft revision**

The ATA commends the expansion of the revised draft, particularly the developments contained within:

Section 2 - Better and clearer lighting design principles, in particular the focus on track workers, and interfacing road and pedestrian users. This section also appears to consider the factors that can influence the visibility of rolling stock including time of day, ambient light, position of the sun, weather, and dust.

Section 4 – The expansion of the section concerning visibility lights is welcomed, as is the emphasis on upholding design principles.

Section 11 – The expanded section on livery contains more emphasis on the importance of high visibility colours and patterns or colours that do not occur in the natural or built environment.

Section 16 – We strongly support the inclusion of this new section and its impact on responsibilities, inspections, replacements, degradation, and cleaning.

#### **4. The ATA supports the low cost, high impact initiatives offered by increased lighting**

We note that the visibility requirements for trains are far below the standards applied and enforced in trucking. High visibility is essential in maximising road user and pedestrian safety, and industry must promote this.

We strongly encourage the addition of comprehensive requirements for additional lighting to be displayed on rolling stock in the form of flashing visibility beacons, side lighting and wagon lighting. These lighting requirements should apply to both passenger and freight trains.

Strobe/beacon lights are a low-cost, high-impact option to address the visibility issues encountered by road users and pedestrians in this space. Strobing or flashing in a person's visual field draws their attention directly in a stimulus-driven response. This is something thought to be hardwired into the brain's visual processes during evolution because it promoted survival and as such, does not require voluntary effort and is not expected to wear off in repeated level crossing encounters. Over 70 per cent of pedestrian collisions at level crossings result in fatal or serious injuries, and mandated strobe/beacon lights could see this figure reduced dramatically.

Wagons need side lighting, higher standard reflectors, and greater visibility generally. Wagons should be lit in high-risk circumstances, such as at night or in areas with a higher risk of collision. Reflectors should be installed at a minimum distance of 3000mm and should be regularly checked to make sure reflectors are not damaged, obscured, deteriorated, or installed in the incorrect location. Higher class material reflectors should be required, as should colours with a brightness greater than the yellow referred to by the standard.

On this occasion, a voluntary standard will not go far enough to ensure we protect the lives of our pedestrians and road users. The standard should be mandatory. A legally binding requirement clarifies expectations and objectives and can make a serious and immediate impact. It will also ensure compliance through the provision of penalties for contravention.